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March 2, 2000

Ex Parte Submission

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-Region, InterLATA
Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Enclosed for filing please find an original and one copy of charts providing corrected hot cut data for Texas PUC Performance Measures (PMs) 114, 114.1, and 115 for the months of December 1999 and January 2000. These corrected data are being provided at the direct request of Commission staff. They replace the data previously provided in Southwestern Bell's "hot cuts ex parte" of January 21, 2000, the Reply Affidavit of Candy Conway (¶¶ 3, 8 & nn.1, 3), the Reply Affidavit of William Dysart (¶ 48), and Southwestern Bell's Reply Brief (pp. 38-50 & Attach. 1 pp. 17-18).

This recalculation does not alter SWBT's showing of nondiscriminatory hot cut performance. In fact, SWBT's actual performance was slightly better than previously stated by some measures. In order to more closely match the categories of reporting referenced in the *Bell Atlantic New York Order*, moreover, we have disaggregated the results by orders of 10 or fewer lines, and orders of more than 10 lines. See *Bell Atlantic New York Order* ¶ 292. This disaggregation should assist the Commission to confirm that SWBT's performance is at least equivalent to Bell Atlantic's nondiscriminatory performance. We also have provided aggregated data combining all hot cuts, regardless of method. This data shows, for example, that 95% of all hot cuts were completed within the Texas PUC's 2-hour benchmark in December 1999, and better than 97% of all hot cuts were completed within 2 hours in January 2000.

The background to this data correction is as follows. In October 1999, in the wake of a manual reconciliation of hot cut data with AT&T, SWBT recognized that a mechanized system

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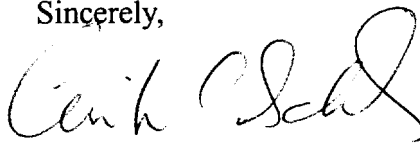
was needed to track data for PMs 114 and 115. That mechanized system was developed and put in place as of December 1, 1999. On December 16, the Texas PUC approved interim PM 114.1 for the reporting of Coordinated Hot Cut (CHC) intervals. In order to report on this additional measure, SWBT made a programming change to its new, mechanized system. Due to an error in this programming, the system counted only the first two lines on a UNE loop order, rather than all the lines in the order. As a result, the total CHC, Frame Due Time (FDT), and new/moved loop numbers for December and January were not accurately stated. The programming error has been corrected for February data. To correct the prior reports, SWBT Local Operations Center (LOC) personnel have reviewed every UNE loop order for the months of December 1999 and January 2000 and identified the number of loops in the order and whether the order involved (i) a CHC conversion, (ii) a FDT conversion, or (iii) new or moved loops. The results of that review are given in the attached charts.

The Commission staff also asked about Texas statewide aggregated data for Performance Measure 59, as stated in two reports filed with the Commission on February 1, 2000 (tracking/chart results) and February 9, 2000 ("hit or miss" report). In generating those particular statewide aggregated reports specifically for this Commission, a manual error was made that caused the December 1999 results for Performance Measure 59 to be misstated. The December results were correct in the following month's reports (for months ending with January 2000). The one-time error was confined to the special aggregated performance reports generated for this Commission, and did not affect SWBT's monthly, disaggregated performance reporting in Texas.

Finally, disaggregations of data for PMs 10.1 and 11.1, filed in ex parte submissions dated February 14, 2000 and February 18, 2000, were mislabeled "DSL not included." (Again, this mislabeling was unrelated to SWBT's monthly performance reporting.) The data in fact *include* manual rejects for xDSL loops within the "UNE" category.

Please let me know if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin C. Schlick", written in a cursive style.

Austin C. Schlick

cc: Mr. Jennings
Mr. Stanley
Ms. Stephens
Ms. Wright
Ms. Farroba, Texas PUC
Ms. Heisler, DOJ
ITS

PM 114 - Percent Premature Disconnects

December 1999		No. of Lines	No. Lines Disconnect. Early	Percent Disconnect. Early	Percent Disconnect. On Time
FDT					
< 10 Lines		1905	15	0.8%	99.2%
> 10 Lines		178	0	0.0%	100%
Total Lines		2083	15	0.7%	99.3%
CHC					
< 10 Lines		1750	17	1.0%	99.0%
> 10 Lines		377	0	0.0%	100%
Total Lines		2127	17	0.8%	99.2%
Grand Total					
< 10 Lines		3655	32	0.9%	99.1%
> 10 Lines		555	0	0.0%	100%
Total Lines		4210	32	0.8%	99.2%

January 2000		No. of Lines	No. Lines Disconnect. Early	Percent Disconnect. Early	Percent Disconnect. On Time
FDT					
< 10 Lines		1244	15	1.2%	98.8%
> 10 Lines		49	0	0.0%	100%
Total Lines		1293	15	1.2%	98.8%
CHC					
< 10 Lines		1064	21	2.0%	98.0%
> 10 Lines		285	34	11.9%	88.1%
Total Lines		1349	55	4.1%	95.9%
Grand Total					
< 10 Lines		2308	36	1.6%	98.4%
> 10 Lines		334	34	10.2%	89.8%
Total Lines		2642	70	2.6%	97.4%

PM 114.1 Cut Duration - December 1999
Excludes Customer Caused Misses

		Cuts				
		No. of Lines	Within 1 Hour	% Within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT	≤ 10 Lines	1905	1802	94.7%*	1843	96.7%
	> 10 Lines	178	156	87.6%	156	87.6%
	Total Lines	2083	1958	94.1%	1999	96.0%
CHC	≤ 10 Lines	1750	1526	87.2%	1645	94.0%
	> 10 Lines	377	246	65.3%	344	91.2%
	Total Lines	2127	1772	83.3%	1989	93.5%
Grand Total						
	≤ 10 Lines	3655	3328	91.1%	3488	95.4%
	> 10 Lines	555	402	72.4%	500	90.1%
	Total Lines	4210	3730	88.6%	3988	94.7%

* 3 customer caused misses
 1802 / (1905 - 3)

	No. of Cuts	Percentage
FDT	2083	33.9%
CHC	2127	34.6%
New / Moved Loops	1931	31.4%
Total	6141	

PM 114.1 Cut Duration - January 2000
Excludes Customer Caused Misses

	No. of Lines	Loops Adjusted for Cust. Caused 1 Hour	Cuts Within 1 Hour	% Within 1 Hour	Loops Adjusted for Cust. Caused 2 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT							
< 10 Lines	1244	1229	1175	95.6%	1230	1197	97.3%
> 10 Lines	49	49	35	71.4%	49	35	71.4%
Total Lines	1293	1278	1210	94.7%	1279	1232	96.3%
CHC							
< 10 Lines	1064	997	931	93.4%	1023	1005	98.2%
> 10 Lines	285	236	223	94.5%	249	249	100%
Total Lines	1349	1233	1154	93.6%	1272	1254	98.6%
Grand Total							
< 10 Lines	2308	2226	2106	94.6%	2253	2202	97.7%
> 10 Lines	334	285	258	90.5%	298	284	95.3%
Total Lines	2642	2511	2364	94.1%	2551	2486	97.5%

	No. of Lines	Percent Caused
FDT	1293	40.6%
CHC	1349	42.3%
New / Moved Loops	544	17.1%
Total	3186	

**PM 115 Percent of SWBT Caused Delayed
Coordinated Cutovers - December 1999**

		No. of Lines	No. Cut Within 30 Minutes	% Within 30 Minutes	No. Cut Within 1 Hour	% Within 1 Hour	No. Cut Within 2 Hours	% Within 2 Hours
FDT	≤ 10 Lines	1905	1822	96.7%*	1839	97.3%	1861	98.1%
	> 10 Lines	178	178	100%	178	100%	178	100%
	Total Lines	2083	2000	96.9%*	2017	97.5%	2039	98.2%
CHC	≤ 10 Lines	1750	1535	96.4%**	1614	98.0%	1677	99.2%
	> 10 Lines	377	308	96.3%***	331	96.5%	358	100%
	Total Lines	2127	1843	96.4%****	1945	97.7%	2035	99.4%
Grand Total	≤ 10 Lines	3655	3357	96.5%	3453	97.6%	3538	98.6%
	> 10 Lines	555	486	97.6%	509	97.7%	536	100%
	Total Lines	4210	3843	96.7%	3962	97.6%	4074	98.8%

* Adjusted for 20 customer caused misses.

** Adjusted for 158 customer caused misses.

*** Adjusted for 57 customer caused misses.

**** Adjusted for 215 customer caused misses.

***** Adjusted for 235 customer caused misses.

Grand Totals and additional columns adjusted according to individual categories.

**PM 115 Percent of SWBT Caused Delayed
Coordinated Cutovers - January 2000**

		No. of Lines	No. Cut Within 30 Minutes	% Within 30 Minutes	No. Cut Within 1 Hour	% Within 1 Hour	No. Cut Within 2 Hours	% Within 2 Hours
FDT	≤ 10 Lines	1244	1200	96.5%	1213	97.5%	1227	98.6%
	> 10 Lines	49	49	100%	49	100%	49	100%
	Total Lines	1293	1249	96.6%	1262	97.6%	1276	98.7%
CHC	≤ 10 Lines	1064	912	92.4%*	1015	97.7%	1039	98.0%
	> 10 Lines	285	272	100%**	285	100%	285	100%
	Total Lines	1349	1184	94.0%	1300	98.2%	1324	98.4%
Grand Total	≤ 10 Lines	2308	2112	94.7%	2228	97.6%	2266	98.4%
	> 10 Lines	334	321	100%	334	100%	334	100%
	Total Lines	2642	2433	95.3%	2562	97.9%	2600	98.6%

* Adjusted for 77 customer caused misses.

** Adjusted for 13 customer caused misses.

Grand Totals and additional columns adjusted according to individual categories.